

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

OSCAR SANCHEZ, MARCUS	§	
WHITE, TESMOND MCDONALD,	§	
MARCELO PEREZ, ROGER	§	
MORRISON, KEITH BAKER, PAUL	§	
WRIGHT, TERRY MCNICKELS,	§	
AND JOSE MUNOZ; <i>On Their Own</i>	§	
<i>And On Behalf Of A Class Of</i>	§	
<i>Similarly Situated Persons,</i>	§	Case No. 3:20-cv-00832
<i>Petitioners/Plaintiffs,</i>	§	
	§	
v.	§	
	§	
DALLAS COUNTY SHERIFF	§	
MARIAN BROWN, <i>In Her Official</i>	§	
<i>Capacity; DALLAS COUNTY,</i>	§	
<i>TEXAS,</i>	§	
<i>Respondents/Defendants.</i>	§	

**MOTION TO INTERVENE
BY THE STATE OF TEXAS, GOVERNOR OF TEXAS,
AND ATTORNEY GENERAL OF TEXAS**

The State of Texas, the Honorable Greg Abbott, Governor of Texas, and the Honorable Ken Paxton, Attorney General of Texas (“State Intervenors”), by and through the Attorney General of Texas, and pursuant to Federal Rule of Civil Procedure 24, move to intervene as defendants in the above-captioned action. In support of this Motion, the State Intervenors rely on the following contemporaneously filed documents:

1. Memorandum in Support of State Intervenors’ Motion to Intervene;
2. [Proposed] Order Granting State Intervenors’ Motion to Intervene; and
3. State Intervenors’ Notice of Opposition.

For the reasons stated in this Motion and accompanying documents, State Intervenors respectfully request that the Court grant this Motion to Intervene.

Respectfully submitted.

KEN PAXTON
Attorney General of Texas

JEFFREY C. MATEER
First Assistant Attorney General

RYAN L. BANGERT
Deputy First Assistant Attorney General

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/s/ Adam Arthur Biggs
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**COUNSEL FOR THE STATE OF TEXAS,
THE GOVERNOR OF TEXAS, AND
THE ATTORNEY GENERAL OF TEXAS**

¹ Exempted from admission to practice requirement pursuant to Local Rule 83.11.

CERTIFICATE OF CONFERENCE

I hereby certify that on April 13, 2020, I conferred with counsel for Plaintiffs and Defendants via email regarding the substance of the foregoing instrument. Plaintiffs stated that they are opposed to this motion. Defendants stated they are unopposed to this motion.

/s/Adam Arthur Biggs

ADAM ARTHUR BIGGS

Special Litigation Counsel

CERTIFICATE OF SERVICE

I hereby certify that on April 13, 2020, a true and correct copy of the foregoing document was transmitted using the CM/ECF system, which automatically sends notice and a copy of the filing to all counsel of record.

/s/Adam Arthur Biggs

ADAM ARTHUR BIGGS

Special Litigation Counsel